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July 16, 2018

VIA ECF

Honorable Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Belleau Technologies, LLC v. JoeAllenPro Ltd., et al.*,
No. 18-CV-06319 (S.D.N.Y.)

Dear Judge Nathan:

We represent Belleau Technologies, LLC ("Belleau"), plaintiff in the above-referenced matter. In accordance with this Court's Individual Practice Rule 3(k), we write to inform the Court of Belleau's intent to file an application for a temporary restraining order to maintain the status quo tomorrow. Belleau's application to the Court stems from defendants JoeAllenPro Limited and Mr. Joe Allen's (collectively, "Defendants") infringement of Belleau's patent in accordance with 35 U.S.C. § 271. Belleau's request is time sensitive as Belleau will seek to enjoin the release of Defendants' infringing software application, which will be available for download on the Apple App Store on July 18, 2018.

Additionally, also in accordance with this Court's Individual Practice Rule 3(k), we write to further inform the Court that Belleau advised the defendants via electronic mail on Friday July 13, 2018, of its intention to file an application for a temporary restraining order early this week. Belleau asked Defendants, who are based in the United Kingdom, whether they consent to the temporary injunctive relief, and if not, to please let us know when they or their counsel are available to appear before the Court. A copy of the email is attached hereto. Thus far, Belleau has received no response.

We appreciate the Court's attention to this matter.

Respectfully,



Nicole M. Mazanitis

cc: Joe Allen (via electronic mail)

Mazanitis, Nicole

From: Mazanitis, Nicole
Sent: Friday, July 13, 2018 4:45 PM
To: 'joe@joeallenpro.com'
Cc: Smith, Turner P.; Graif, Michael R.
Subject: Belleau Technologies, LLC v. JoeAllenPro Ltd., et al. (S.D.N.Y.) - Notice of TRO Filing
Attachments: [001] 2018-07-12 Complaint.PDF; [001-1] 2018-07-12 Exhibit A to Complaint.PDF; [001-2] 2018-07-12 Exhibit B to Complaint.PDF; [001-3] 2018-07-12 Exhibit C to Complaint.PDF; [002] 2018-07-12 Civil Cover Sheet.PDF; [003] 2018-07-12 Plaintiff_s Rule 7.1 Statement.PDF; [004] 2018-07-12 Patent Report.PDF; [005] 2018-07-12 JoeAllenPro Summons.PDF; [006] 2018-07-12 Joe Allen Summons.PDF; [008] 2018-07-13 Filed Patent Form.PDF; [009] 2018-07-13 Executed Summons to Joe Allen.PDF; [010] 2018-07-13 Executed Summons to JoeAllenPro.PDF; [011] 2018-07-13 Pro Hac Motion.PDF; [011-1] 2018-07-13 Sadkin Affidavit ISO Pro Hac Motion.PDF; [011-2] 2018-07-13 Exhibit A to Sadkin Declaration.PDF; [011-3] 2018-07-13 Exhibit B to Sadkin Declaration.PDF

Dear Mr. Allen,

We represent Belleau Technologies, LLC in the *Belleau Technologies, LLC v. JoeAllenPro Ltd., et al.* litigation, pending in the United States District Court for the Southern District of New York (No. 18-cv-06319).

In accordance with the Court's Individual Practice Rule 3(k), we write to inform you that early next week, we plan on applying to the Court for a temporary restraining order, enjoining the release of your infringing AutoPrompter application. Please let us know if you consent to the temporary injunctive relief (which would be in effect until the Court rules on a preliminary injunction motion). If you do not consent, please let us know when you or your counsel are available next week to appear before the Court.

Additionally, attached please find courtesy copies of the documents filed on the case docket.

Regards,

Nicole M. Mazanitis
Associate

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